

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CESAR CRUZ,  
Defendant

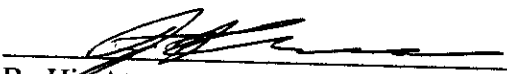
)  
)  
)  
)  
)  
)

Criminal No. 05-30042-MAP

**MOTION FOR FUNDS FOR AN INTERPRETER**

Now comes the Defendant and moves this Honorable Court for funds in an amount not to exceed \$500.00 for a Spanish speaking interpreter, specifically Enrique McDonald. As grounds therefor, counsel for the Defendant states that the interpreter is necessary in order to review the so-called "consensual audio intercept" discovery provided by the Government. In further support of this motion, counsel for the Defendant submits his affidavit herewith.

THE DEFENDANT

  
By His Attorney  
Joseph A. Franco, Esq.  
BBO# 543038  
51 Park Avenue, Suite 7  
West Springfield, MA 01089  
Tel: (413) 737-2675  
Fax: (413) 747-1721

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

|                          |   |                           |
|--------------------------|---|---------------------------|
| UNITED STATES OF AMERICA | ) |                           |
|                          | ) |                           |
| v.                       | ) | Criminal No. 05-30042-MAP |
|                          | ) |                           |
| CESAR CRUZ,              | ) |                           |
| Defendant                | ) |                           |

**AFFIDAVIT IN SUPPORT OF DEFENDANT'S**  
**MOTION FOR FUNDS FOR AN INTERPRETER**

Now comes Joseph A. Franco and states that he has personal knowledge of the facts contained herein and makes oath that they are true.

1. I, Joseph A. Franco, am a duly authorized and practicing attorney in the Commonwealth of Massachusetts and admitted to practice before the Federal Court.
2. I have been appointed to represent the Defendant in the instant matter.
3. I have been provided with discovery by the Government, including a DVD which contains audio and video documentation.
4. Most of the audio on the DVD is in Spanish.

5. This counsel is not fluent in Spanish.
6. In order to properly review the documentation and prepare for trial, a Spanish speaking interpreter is necessary.
7. The funds requested are reasonable and necessary.
8. Justice dictates that this motion be allowed.

Signed under the pain and penalty of perjury this 5<sup>th</sup> day of October, 2005.

  
Joseph A. Franco, Esq.